

## DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

### RCRA Corrective Action

Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name:	<b>Former Black &amp; Decker (GE) or Queen City Business Center</b>
Facility Address:	<b>1801 South 12<sup>th</sup> Street, Allentown, Pennsylvania 18103</b>
Facility EPA ID #:	<b>PAD 00 300 1732</b>

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

☒ If yes - check here and continue with #2 below.

☐ If no - re-evaluate existing data, or

☐ If data are not available skip to #6 and enter "IN" (more information needed) status code.

### **BACKGROUND**

#### **Definition of Environmental Indicators (for the RCRA Corrective Action)**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

#### **Definition of "Current Human Exposures Under Control" EI**

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

#### **Relationship of EI to Final Remedies**

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

#### **Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

**Current Human Exposures Under Control**  
**Environmental Indicator (EI) RCRIS code (CA725)**

Page 2

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **“contaminated”**<sup>1</sup> above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater	<b>X</b>			<b>See Below.</b>
Air (indoors) <sup>2</sup>		X		See Below.
Surface Soil (e.g., <2 ft)		X		See Below.
Surface Water		X		See Below.
Sediment		X		See Below.
Subsurf. Soil (e.g., >2 ft)		X		See Below.
Air (outdoors)		X		See Below.

\_\_\_\_\_ If no (for all media) - skip to #6, and enter “YE,” status code after providing or citing appropriate “levels,” and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.

**X** If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

\_\_\_\_\_ If unknown (for any media) - skip to #6 and enter “IN” status code.

**Rationale and Reference(s):** The Department accepted a request by Apex Environmental for a non-residential, non-use aquifer determination at the Queen City Business Center site, a copy of the letter is attached to the original EI Form. With this determination of appropriate contamination levels, the groundwater was found to be contaminated above appropriate groundwater MSC levels for non-residential, non-used aquifers for Trichloroethene (TCE), Tetrachloroethene (PCE), Vinyl Chloride, and cis-1,2-Dichloroethene. All other analytes were found to be below the groundwater MSC levels for non-residential, non-used aquifers. No analytes in the Subsurface or Surface soil were found to be above the MSC for Direct Contact Numerical Value for a non-residential location at either the 0 - 2' or 0 - 15' depth. No analytes were found in the Subsurface or Surface soil at levels greater than the MSC Soil to Groundwater Pathway for non-residential, non-used aquifers. With these findings, the Subsurface and Surface soil is considered not to be "contaminated" for the purpose of this Environmental Indicator.

**Current Human Exposures Under Control  
Environmental Indicator (EI) RCRIS code (CA725)**

Page 3

**Indoor Air, Outdoor Air, Sediment and Surface Water are not "contaminated" for purpose of this Environmental Indicator. Apex Environmental proved that vapor phase migration of even the highest contamination levels would not exceed commercial/industrial inhalation standards (PEL TWAs) for indoor or outdoor Air Quality. Also, on May 5, 1992, BCM conducted a Soil Vapor Survey onsite, which detected VOCs below acceptable levels. For Sediment, there is no reason to believe that the constituents of concern would be affecting this media. Apex Environmental proved with hydrogeological data that the direction of groundwater flow and size of the contamination plume would not affect any surface water, since the natural attenuation of all contaminants decreases to levels below used aquifer MSCs within 1000 feet. No surface water is affected by this aquifer for approximately 2000 feet.**

Footnotes:

<sup>1</sup> "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

<sup>2</sup> Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

**Current Human Exposures Under Control**  
**Environmental Indicator (EI) RCRIS code (CA725)**

Page 4

3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

**Summary Exposure Pathway Evaluation Table**

<b><u>“Contaminated” Media</u></b>	Potential <b><u>Human Receptors</u></b> (Under Current Conditions)						
	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food <sup>3</sup>
Groundwater	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>			<b>NO</b>
Air (indoors)	---	---	---				
Soil (surface, e.g., <2 ft)	---	---	---	---	---	---	---
Surface Water	---	---			---	---	---
Sediment	---	---			---	---	---
Soil (subsurface e.g., >2 ft)				---			---
Air (outdoors)	---	---	---	---	---		

Instructions for **Summary Exposure Pathway Evaluation Table**:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not “contaminated” as identified in #2 above.
2. enter “yes” or “no” for potential “completeness” under each “Contaminated” Media -- Human Receptor combination (Pathway).

**Note:** In order to focus the evaluation to the most probable combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have check spaces (“\_\_\_”). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

**X** If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter “YE” status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional **Pathway Evaluation Work Sheet** to analyze major pathways).

\_\_\_\_\_ If yes (pathways are complete for any “Contaminated” Media - Human Receptor combination) - continue after providing supporting explanation.

\_\_\_\_\_ If unknown (for any “Contaminated” Media - Human Receptor combination) - skip to #6 and enter “IN” status code.

**Rationale and Reference(s):** Though the groundwater was found to have constituents above the groundwater MSC levels for non-residential, non-used aquifers, there is no complete pathway for potential Human Receptors. This is due to the fact that in this urban environment there are no public drinking water wells in the affected non-used aquifer. The City of Allentown provides public drinking water by the use of a public water main to all area businesses and residents. Also, the City Code requires that all water distribution systems be connected to the public drinking water main. The groundwater flow is very constant, and does not connect with surface water within 2000 feet of the source of contamination. The location of this site is in an urban third class city where there is no potential for the growth of food crops.

<sup>3</sup> Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

**Current Human Exposures Under Control**  
**Environmental Indicator (EI) RCRIS code (CA725)**

Page 5

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”**<sup>4</sup> (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?

\_\_\_\_\_ If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

\_\_\_\_\_ If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

\_\_\_\_\_ If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

Rationale and Reference(s): \_\_\_\_\_

<sup>4</sup> If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

**Current Human Exposures Under Control**  
**Environmental Indicator (EI) RCRIS code (CA725)**

Page 6

5. Can the “significant” **exposures** (identified in #4) be shown to be within **acceptable** limits?

\_\_\_\_\_ If yes (all “significant” exposures have been shown to be within acceptable limits) - continue and enter “YE” after summarizing and referencing documentation justifying why all “significant” exposures to “contamination” are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

\_\_\_\_\_ If no (there are current exposures that can be reasonably expected to be “unacceptable”)- continue and enter “NO” status code after providing a description of each potentially “unacceptable” exposure.

\_\_\_\_\_ If unknown (for any potentially “unacceptable” exposure) - continue and enter “IN” status code

Rationale and Reference(s): \_\_\_\_\_

**Current Human Exposures Under Control**  
**Environmental Indicator (EI) RCRIS code (CA725)**

Page 7

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

**X**    YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the **Former Black & Decker (GE) or Queen City Business Center** facility, EPA ID # **PAD 00 300 1732**, located at **1801 South 12<sup>th</sup> Street, Allentown, Pennsylvania 18103** under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

\_\_\_\_\_ NO - "Current Human Exposures" are NOT "Under Control."

\_\_\_\_\_ IN - More information is needed to make a determination.

Completed by    (signature) \_\_\_\_\_ Date 01-31-01  
                          (print)        Brian Hilliard  
                          (title)        Environmental Chemist I, PADEP

Supervisor        (signature) \_\_\_\_\_ Date 09-14-01  
                          (print)        Paul Gotthold  
                          (title)        PA Operations Branch Chief  
                          (EPA Region or State)    EPA, Region 3

**Locations where References may be found:**

Pennsylvania Department of Environmental Protection (PADEP)  
Northeast Regional Office  
2 Public Square  
Wilkes-Barre, PA 18711-1791

**Contact telephone and e-mail numbers:**

(name)	<u>Brian Hilliard</u>	<u>Gerald Olenick</u>
(phone #)	<u>570-826-2090</u>	<u>570-826-2498</u>
(e-mail)	<u><a href="mailto:bhilliard@state.pa.us">bhilliard@state.pa.us</a></u>	<u><a href="mailto:golenick@state.pa.us">golenick@state.pa.us</a></u>

**FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.**